

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

TINA MCGARITY,

Plaintiff,

v.

SANOFI US SERVICES, INC., et al.,

Defendants.

CASE NO. 3:23-CV-212-TCB

**DEFENDANTS' MOTION FOR JUDGMENT ON THE PLEADINGS**

Defendants sanofi-aventis U.S. LLC and Sanofi US Services Inc. (collectively “Sanofi”) move for judgment on the pleadings pursuant to Federal Rule of Civil Procedure 12(c). Plaintiff Tina Mcgarity’s claims are barred by Georgia’s statute of limitations. *See* O.C.G.A. § 9-3-33.

For the reasons more fully set forth in the attached Memorandum in Support, the Court should dismiss Ms. Mcgarity’s case with prejudice.

Respectfully submitted this 24<sup>th</sup> day of January, 2024.

/s/ Christopher P. Gramling

Christopher P. Gramling, pro hac vice  
SHOOK, HARDY & BACON L.L.P.  
2555 Grand Blvd.  
Kansas City, Missouri 64108  
Phone: (816) 474-6550  
Fax: 816-421-5547  
[cgramling@shb.com](mailto:cgramling@shb.com)

Jason S. Allard, Georgia Bar No. 660305  
Joshua L. Becker, Georgia Bar No. 046046  
SHOOK, HARDY & BACON L.L.P.  
1230 Peachtree Street, NE Suite 1200  
Atlanta, Georgia 30309  
[jallard@shb.com](mailto:jallard@shb.com)  
[jbecker@shb.com](mailto:jbecker@shb.com)  
(t) (470) 867-6000  
(f) (470) 867-6001

*Attorneys for sanofi-aventis U.S. LLC and  
Sanofi US Services Inc., f/k/a Sanofi-Aventis  
US Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA**

TINA MCGARITY,

Plaintiff,

v.

SANOFI US SERVICES, INC., et al.,

Defendants.

CASE NO. 3:23-CV-212-TCB

**CERTIFICATE OF SERVICE AND  
LOCAL RULE 7.1(D) CERTIFICATION**

I hereby certify that on January 24, 2024, I electronically filed the foregoing with the Clerk of Court using the ECF system, which will send notification of such filing and effectuate service to all counsel of record in this matter, pursuant to Local Rule 5.1.

I further certify that this brief has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C).

*/s/ Christopher P. Gramling*  
Christopher P. Gramling, pro hac vice